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October 20, 2015

VIA ECF

Hon. J. Paul Oetken
U.S. District Judge
Thurgood Marshall U.S. Courthouse
40 Foley Square, Room 2101
New York, NY 10007

Re: ***Karoon, et al. v. Credit Suisse Group, A.G.***
Civil Action No. 15-CV-04643-JPO

Dear Judge Oetken:

We represent plaintiffs in the above matter, and we write concerning the pending motion to dismiss.

Having read the reply papers of Credit Suisse, and even though the Affidavit of Kayvan Karoon explains that Majid Karoon and all trust beneficiaries were New York residents at the time the trust at issue was created, it is apparent that Credit Suisse is confused about where Majid Karoon resided and has created confusion in the record on this point. We therefore are prepared to submit a Supplemental Affidavit solely to clarify and explain where Majid Karoon and the beneficiaries resided at the time the trust was created, and would request leave of the Court to do so.

We thank Your Honor for considering this request.

Respectfully,

S/Philip L. Guarino
(admitted *pro hac vice*)

cc: Michael J. Sullivan, Esq. (via e-mail)